

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

In re: ANDREA BRICHEL ROSS

Case No.: 22-50198-btf-13

Debtor

MOTION TO DISMISS FAILURE TO MAKE PLAN PAYMENTS

COMES NOW, Richard V. Fink, Chapter 13 Trustee, and moves to dismiss the above-captioned case for cause pursuant to 11 U.S.C. Section 1307(c) and in support thereof states:

1. The debtor(s) are delinquent in plan payments in the amount of \$2,295.00.
2. The current monthly plan payment of \$915.00 is due on the 26th of each month.

WHEREFORE, the trustee moves the Court for an order of dismissal, without prejudice, of the above-captioned case for cause pursuant to 11 U.S.C. Section 1307(c).

January 03, 2023

Respectfully submitted,

/s/ Richard V. Fink, Trustee

Richard V. Fink, Trustee
2345 Grand Blvd., Ste. 1200
Kansas City, MO 64108-2663
(816) 842-1031

NOTICE OF MOTION

Any response to the motion must be filed within twenty-one (21) days of the date of this notice (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006) with the Clerk of the United States Bankruptcy Court.

Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. Parties not represented by an attorney may mail a response to the Court at the address below. If a response is timely filed, the Court will either rule the matter based on the pleadings, or set the matter for a hearing. If a hearing is to be held, notice of such hearing will be sent to all parties in interest. **If no response is filed within twenty-one (21) days (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006), this proceeding will be dismissed by separate Order of the Court.**

For information about electronic filing, go to <http://www.mow.uscourts.gov>. If you have any questions about this document, contact your attorney.

Court Address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106

NOTICE OF SERVICE

The following parties will be served either electronically or by United States First Class Mail and a certificate of service will be filed thereafter:

DEBTOR(S)

WAGONER BANKRUPTCY GROUP (206) - ATTORNEY FOR DEBTOR(S)

/s/ Richard V. Fink, Trustee

TD /Motion - Dismiss - Failure to Make Plan Payments